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Region III

Oil Program Activities

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EMERGENCY RESPONSE NOTIFICATION SYSTEM

The Emergency Response Notification System (ERNS) is a computer database containing information on reports of oil and hazardous substance releases that have occurred throughout the United States and have been reported to the National Response Center (NRC), the ten EPA Regions, or the U.S. Coast Guard. ERNS data can be used to analyze reports of releases, support emergency planning efforts, and assist decision makers in developing spill prevention programs.

Most people think of oil spills as spills involving petroleum products; however spills of edible oils, which can be harmful to marine life, must also be reported to the NRC. To differentiate between the two types, oil release reports have been sub-divided into two categories, "petroleum" and "non-petroleum oil," which includes edible oils. On average, 57 percent of the approximately 300,000 reports of releases in ERNS are classified as oil, with petroleum reports outnumbering non-petroleum oil reports by 2 to 1.

When to report? The NRC must be notified of discharges of oil affecting U.S. waters in accordance with the regulations issued under the Federal Water Pollution Control Act or Clean Water Act. These regulations require the person in charge to notify the NRC of a discharge of oil which:

- Causes a sheen to appear on the surface of the water;
- Violates applicable water quality standards; or
- Causes sludge or an emulsion to be deposited beneath the surface of the water or upon the adjoining shoreline.

Additional information on the ERNS database may be obtained by calling the ERNS Information Line at (202) 260-2342. ERNS data may also be obtained through the Internet at: www.epa.gov/ERNS.

Information taken from EPA ERNS and Oil Fact Sheet, August 1995.

REGULATIONS

INTEGRATING SPCC

So your company heard about the Integrated Contingency Plan (ICP) guidance (61 FR 109, pg 28642, June 5, 1996), and you want to combine your Facility Response Plan (FRP), and your Spill Prevention, Control & Countermeasures (SPCC) plan, and maybe the state's spill plan into one. **Stop right there!** That is until you have read the rest of this article.

The problem with integrating the SPCC plan into an ICP or "One Plan" format is that the SPCC regulations stipulate the format; "*The complete SPCC plan shall follow the sequence outlined...*" in 40 CFR 112.7. Unlike the FRP regulations, this language does not grant very much flexibility with the format. Sure, EPA realizes that the first page in the ICP guidance actually lists the SPCC regulations along with other regulations such as OSHA, USCG, RSPA, etc. This would lead you to think that you can fully integrate the SPCC with all the other regulations listed on that page; right? Wrong! Remember, the ICP guidance is just that, guidance. It does not have overriding authority with regard to the regulations it addresses. In fact, the ICP guidance states that "*Individual agencies' planning requirements...are not changed by the advent of the ICP format option.*" In other words, the specific SPCC requirement for a certain format cannot be disregarded by the ICP guidance.

However, there are two ways that you can "integrate" your SPCC plan without violating the regulation's requirement. First, you can simply place the entire SPCC plan into the Annex 7, Prevention Section. This method while it seems to be an acceptable solution, ignores the goal of the ICP guidance which is to avoid duplication of information. Another method is to include your SPCC plan in Annex 7, but under each required SPCC section header, cross reference to other sections/pages of the ICP where the information is already discussed. The end result in Annex 7 will be an SPCC plan that has the PE Seal and all the required outlined section headers with a reference as to where to find the specific information. If you have any questions contact Rob Sanchez (215)566-3451 or the SPCC Hotline

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RECYCLING

EARTH'S 911 FOR THE ENVIRONMENT

The Environmental/Recycling Hotline, dubbed the "Earth's 911 for the Environment," is a public/private partnership between EPA, the U.S. Postal Service, and several private-sector businesses. A state-of-the-art computerized, interactive phone and Internet system, the Environmental/Recycling Hotline is expanding nationwide to allow everyone in the U.S. to have access to environment and recycling information. The Hotline's mission is to provide geographically specific environmental and recycling information at no cost. Through a single 800 number, callers can access several sections of information, including the nearest recycling center. By calling (800) CLEANUP or accessing the Hotline's web site at <http://www.1800cleanup.org> and entering a zip code, callers can determine the nearest recycling center for up to 15 different types of recyclable materials. Callers can also obtain other environmental information including educational materials on reducing, reusing, recycling, managing household hazardous waste, and buying recycled-content products.

PLANNING ACTIVITIES

TRI-STATE SUB-AREA CONTINGENCY PLANNING UPDATE HUNTINGTON/OHIO RIVER VALLEY AREA

Contingency planning in this area is unique due to the numerous federal, state and local response agencies having responsibility to respond to releases of hazardous substances or oil into the lower Ohio River. A hazardous substance or oil release in this area has the ability to affect citizens and private interests in many different jurisdictions (remember the Ashland oil spill in the late 1980's?). Efforts are underway to coordinate spill/release contingency planning efforts in the lower Ohio River Valley between EPA Regions 3, 4 and 5, USCG MSO-Huntington, Kentucky, Ohio and West Virginia and numerous county/local jurisdictions which lie along the lower (south of Hannibal Lock and Dam) Ohio River and its tributaries. Coordinated contingency planning is needed to ensure an effective coordinated response to a release of hazardous substances and/or oil into the lower Ohio River Valley and its tributaries. A meeting attended by EPA Regions 3 and 5, USCG MSO-Huntington, Kanawha Putnam Emergency Planning Committee, local emergency responders and local industry representatives was held at MSO-Huntington on August 28th. The status and use of the MSO-Huntington developed Huntington Emergency Response Operations (HERO) plan was discussed as well as developing strategies to coordinate contingency planning

between EPA Regions 3, 4 and 5, USCG MSO-Huntington, other federal agencies such as FEMA, USFWS, NOAA, the states of Kentucky, Ohio and West Virginia, and local EMA/OES/LEPC emergency response personnel. A meeting between, EPA Regions 3, 4 and 5, USCG MSO-Huntington and Ohio, Kentucky and West Virginia SERC/LEPC and EMA/OES personnel has been set for October 7, 1997 at MSO-Huntington in Huntington, WV at 1:00 pm to initiate coordination of contingency planning efforts in the lower Ohio River Valley. Please contact EPA Region 3 OSC, Jeff Dodd at 304-234-0254, or MSO-Huntington Lt. Shawn Moon at 304-529-5524 for further information.

SPCC INFORMATION

SPCC INSPECTORS GO TO THE SOURCE

One of the geographical areas targeted for Spill Prevention, Control and Countermeasures (SPCC) inspections this year was Winchester, Virginia. SPCC Inspector R. Sanchez, and On-Scene Coordinator M. Powell conducted SPCC inspections at petroleum distributors located in and around the Winchester area during August of this year. During the inspections each of the facilities' SPCC Plans were reviewed. It was noted by the inspectors that a significant number of these plans were produced by a local engineer.

The plans produced by this engineer fulfilled the bare minimum requirements of the SPCC regulations, but tended to provide "yes/no" answers where narrative was appropriate. The "spirit" of SPCC was clearly not being met, i.e. the investment of effort was not being applied up-front. After the inspectors had exerted considerable effort with each of the facility owners/operators, obtaining the information absent from these plans, a change of approach was taken.

While not typical, the SPCC inspectors visited the local engineer at his office. Guidance documents were provided (boy can we supply documents), along with check lists that are used by inspectors to review SPCC plans. The areas considered deficient were discussed, and the inspector's comments were well received. It is envisioned that the inspector's investment of effort with this engineer (applied up-front), like SPCC plans, will payoff in the long run.

UPCOMING EVENTS

THE NATIONAL MARKETPLACE FOR THE ENVIRONMENT

A major conference and trade show to be held in Washington, DC on November 18-20, will give acquisition professionals an

opportunity to see how environmentally preferable procurement can increase efficiency, lower costs, and prevent pollution. It will showcase key government programs in transportation, energy, agriculture, renewable resources, pollution prevention, and environmental exports. The event is sponsored by the Departments of Energy and Agriculture, the Association of Counties, and the U.S. Conference of Mayors. Also participating are the General Services Administration, EPA, and the Departments of Defense and Commerce. For more information, call (818) 906-2700 or (800) 334-EXPO, web site, <http://www.ecoexpo.com>.

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THE 9TH ANNUAL CEPP CONFERENCE

Pittsburgh, PA will be the site of U.S. EPA Region III's 9th Annual Chemical Emergency Preparedness and Prevention (CEPP) Conference, December 2-5, 1997 at the downtown Hilton Hotel and Towers. The conference theme is "If Not Us, Who?", and will feature an award winning smorgasbord of preparedness and prevention topics.

Key topics covered at this year's conference will include: Crisis Management; Integrated Contingency Planning; Clean Air Act; Risk Management Planning; Oil Pollution Act; Exercise Design and Evaluation; Media Communications and Public Affairs Issues; Case Studies in Response, Enforcement, and Planning; Federal Facilities' Compliance Initiatives; LEPC and SERC Round tables; EPA Region III's innovative Chemical Safety Audit Program; and Environmental Crimes and Terrorism.

For further information, or registration via the Internet site: <http://www.vtec2.com>, or call 1-888-429-6289, fax: (215) 357-3613. For exhibitor information contact Ray DeMichiei at (412) 255-4720.

REGION III RRT MEETING

The next regularly scheduled Region III RRT meeting will be held on Jan 28-29, 1998. The meeting will take place in Williamsburg, VA.

For further information, contact Linda Marzulli at (215) 566-3256.

SPCC INFORMATION

SPCC INFORMATION GUIDE

EPA Region III has available, a revised Spill Prevention Control and Countermeasure (SPCC) Information Guide.

The new guide has incorporated the following:

- A revised example SPCC plan with a certified amendment.
- A revised telephone list of EPA Region III Oil Program Personnel.
- Updated informational SPCC course slides.
- A revised table of contents deleting out the old 112.6 and 114 referencing civil penalties which are obsolete and replaced with Class I and Class II penalties.

To receive a free copy of the guide, request a copy by mail to EPA, Region III, SPCC Coordinator (3HW32), 841 Chestnut Street, Philadelphia, PA 19107, by fax at (215) 566-3254, or contacting by contacting, Regina A. Starkey at (215) 566-3292.

SPCC Plan Certification

The SPCC Plan must be certified by a professional engineer registered in any state; he or she may also be from the facility that he or she is certifying. The engineer certifies that the facility has implemented all the spill requirements listed in 40 CFR 112 or has the facility provide a schedule of when all discrepancies will be corrected. These discrepancies must be corrected in a timely fashion.

INTERNET INFORMATION

STATE WEBSITES

The following states have created websites on the Internet:

Delaware: www.dnrec.state.de.us
Maryland: www.mde.state.md.us
Pennsylvania: www.dep.state.pa.us
Virginia: www.deq.state.va.us
West Virginia: charon.osmre.gov

The United States Coast Guard website is:

www.dot.gov/dotinfo/uscg/contact.html

To obtain Local Emergency Planning Commission (LEPC) information needed for Facility Response Plans the website is:

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**This publication is now available via the Internet.
Go to EPA Headquarters Internet web site:**

HTTP://WWW.EPA.GOV/oilspill/index.HTM.

If you'd like to submit an article, comments, suggestions, etc., or receive your copy of this newsletter, please contact: Paula Curtin at (304) 234-0256, or you may send the information via Internet to:

CURTIN.PAULA @ EPAMAIL.EPA.GOV

RRC III QUARTERLY FIGURES

The Region III Response Center recorded and processed approximately 315 oil spill notification reports during the fourth quarter of Fiscal Year 97. Of the reports, 6 spills resulted in accessing the Oil Spill Liability Trust Fund for cleanup and/or monitoring purposes. A total of 1359 spills have been recorded in FY 97.

EPA REGION III SPCC & FRP HOTLINE

Have a question on Spill Prevention, Control & Countermeasures (SPCC) 40 CFR 112.1 or Facility Response Plans (FRP) 40 CFR 112.20? EPA Region III has in place a hotline to answer these and other oil related questions. The hotline is staffed by the very people that will inspect your facility and review your spill plans. The hotline number is **(215) 566-3452**.

Region III Oil Program Contacts:

Karen Melvin	(215) 566-3275
-Chief, Removal Enforcement and Oil Section	
Cordy Stephens	(215) 566-3276
-Secretary	
Steve Jarvela	(215) 566-3259
-On-Scene Coordinator	
-Inland Area Committee, Chair	
Linda Ziegler	(215) 566-3277
-Oil Program Coordinator	
-Facility Response Plan (FRP) Coordinator	
-Oil Pollution Act	
-RRT, Area Committees, Port Area Committee	
-Spill Response Countermeasure (Dispersants)	
-Outreach	
Jean Starkey	(215) 566-3292
-SPCC Coordinator	
-OPA Spill Penalty Program	
-SPCC Enforcement	
-Multi-Media Enforcement	
-Outreach	
Paula Curtin	(304) 234-0256
-Oil Enforcement Coordinator	
-OPA Spill Penalty Program	
-Spill Investigations	
-Oil Program Activities Newsletter	
-Outreach	
Mike Welsh	(215) 566-3285
-SPCC/FRP Inspector & Plan Reviews	
-Outreach	
Rob Sanchez	(215) 566-3451
-SPCC/FRP Inspector & Plan Reviews	
-Outreach	
Bernie Stepanski	(215) 566-3288
-Spill Investigations	
Frank Cosgrove	(215) 566-3284
-SPCC/FRP Inspections and Plan Review	
-SPCC Enforcement Support	
-Outreach	

